



Foodvacation Canada <foodvacation@gmail.com>

(no subject)

foodvacation Canada <foodvacation@gmail.com>
To: Douglas Handshoe <earning04@gmail.com>

Tue, Jul 17, 2018 at 9:27 PM

Mr. Handshoe:

I will be asking the Court to reconsider the text-only order of today's date as having a court reporter in Mississippi while I am in a foreign country does not accord with the rules and substantive case law.

Nevertheless I can move appointments and be available during normal business hours here on July 24 or 27 if this is to be purely a telephonic deposition, with the court reporter in Mississippi and no one here. I waive receiving notice by post, but ask to receive notice of the deposition under Rule 30(b).

I can provide you with a North American telephone number to call.

Charles Leary

Exhibit B



Foodvacation Canada <foodvacation@gmail.com>

FW: Activity in Case 1:15-cv-00382-HSO-JCG Handshoe v. Perret et al Order on Motion for Miscellaneous Relief

Douglas Handshoe <earning04@gmail.com>
To: foodvacation Canada <foodvacation@gmail.com>

Tue, Jul 17, 2018 at 5:11 PM

Mr. Leary:

I am forwarding this to you as a courtesy so that you will have it immediately instead of two weeks from now. Magistrate Gargiulo agreed to commission Patsy Ainsworth Reporting, Inc to telephonically administer the oath and record your deposition. All that we have left to do is establish a date and time, which greatly simplifies things.

Since my last email to you my schedule has changed slightly. I have engagements on July 25 and July 26 that can not be cancelled. Ms. Ainsworth will need at least two days advance notice..

Please furnish me with a list of dates so we can get the deposition scheduled and behind us. I thank you in advance for your cooperation.

Doug

Doug Handshoe

Slabbed New Media LLC

Post Office Box 788

Wiggins, MS 39577-0788

Phone: (601) 928-5380

www.slabbed.org

From: cmecfhelpdesk@mssd.uscourts.gov <cmecfhelpdesk@mssd.uscourts.gov>

Sent: Tuesday, July 17, 2018 10:11 AM

To: Courtmail@mssd.uscourts.gov

Subject: Activity in Case 1:15-cv-00382-HSO-JCG Handshoe v. Perret et al Order on Motion for Miscellaneous Relief

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U.S. District Court

Southern District of Mississippi

Notice of Electronic Filing

The following transaction was entered on 7/17/2018 at 10:10 AM CDT and filed on 7/17/2018



Foodvacation Canada <foodvacation@gmail.com>

deposition

3 messages

foodvacation Canada <foodvacation@gmail.com>
To: Douglas Handshoe <earning04@gmail.com>

Sat, Jul 7, 2018 at 11:07 PM

Mr. Handshoe:

I can be available this coming Thursday, Girona, Girona, Spain.

Charles Leary

Douglas Handshoe <earning04@gmail.com>
To: foodvacation Canada <foodvacation@gmail.com>

Mon, Jul 9, 2018 at 3:01 PM

Mr. Leary

Thank you for your reply and cooperation. Thursday is very short notice and while it is not an impossibility it would require I rearrange my work schedule as well as find a notary there in Spain to administer the oath and swear an affidavit. I did google the area and there are several notaries in your area.

We need to nail down a few important details as Girona is 7 hours ahead of US Central Time. The transcriptionist here usually start their day at 9 AM, which would be 4 pm your time. My understanding is the local custom there is to close for a few hours midday and be open later in the evening. I noted several notary offices there were open until 7pm local time. I think that beginning at 9AM US Central (4PM in Girona) should work out well for everyone.

It may be easiest for you to appear at the office of whatever notary I hire to conduct the deposition.

I should know later today whether this coming Thursday is feasible. Please develop a list of dates between the 16th and 27th in case Thursday is a no go.

Doug Handshoe

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From: foodvacation Canada <foodvacation@gmail.com>
Sent: Saturday, July 07, 2018 4:07 PM
To: Douglas Handshoe <earning04@gmail.com>
Subject: deposition

Mr. Handshoe:

I can be available this coming Thursday, Girona, Girona, Spain.

Charles Leary

Douglas Handshoe <earning04@gmail.com>
To: foodvacation Canada <foodvacation@gmail.com>

Mon, Jul 9, 2018 at 10:12 PM

Mr. Leary

I was unable to reorganize my schedule to free up Thursday but I did some additional research on the topic in general.

You obviously have been reluctant to disclose your exact location and conducting an English deposition before a Spanish Notary is not ideal. I see that Rule 28(D) would allow the Oath to be administered Telephonically should the Court order it. Written stipulations would also be an option but I only found one old case which allowed it for Telephonic oaths. This way your location can remain your secret.

I propose going to the Court with an agreed Motion under Rule 28 for the Magistrate to commission the firm of Patsy Ainsworth Reporting, Inc. to administer the oath telephonically and transcribe the deposition at my expense. Ms. Ainsworth has several Court Reporters in this area that can handle the task. I would be happy to draw the agreed Motion for filing into the record as well as the Court order should this be agreeable to you.

We still need to agree on a date and a time for the deposition. As of today I have appointments scheduled on July 18 and July 26 that cannot be moved. Any other day those next two weeks works for me.

Please advise.

Doug

Doug Handshoe

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From: Douglas Handshoe <earning04@gmail.com>
Sent: Monday, July 09, 2018 8:02 AM
To: 'foodvacation Canada' <foodvacation@gmail.com>
Subject: RE: deposition

[Quoted text hidden]